

USDC - BALTIMORE
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Jeremy McCullough

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Shanai Woodard
Corey Thomas Hall

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case 24-cv-1982

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

HD

Rev'd by: AR

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Jeremy McCullough</u>
Street Address	<u>1409 Holbrook Street</u>
City and County	<u>Baltimore City</u>
State and Zip Code	<u>Maryland 21202</u>
Telephone Number	<u></u>
E-mail Address	<u></u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Shanai Woodard</u>
Job or Title (if known)	<u>building service Supervisor</u>
Street Address	<u>3641 Highline road</u>
City and County	<u>Baltimore</u>
State and Zip Code	<u>MD 21229</u>
Telephone Number	<u>347-724-6712</u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name

Corey Thomas hall

Job or Title

Electrician

(if known)

Street Address

3641 Highline road

City and County

Baltimore

State and Zip Code

MD 21229

Telephone Number

E-mail Address

(if known)

Defendant No. 3

Name

Job or Title

(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

(if known)

Defendant No. 4

Name

Job or Title

(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

(if known)

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal question

☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

IIED
Tortious interference with parental rights
Defamation

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____ is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Shanai Woodard, is a citizen of the State of (name) MD. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$4 Million dollars 1 million per year
with Convincing evidence that defendant engaged
in the acts of oppression, Fraud and Malice.

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Corey Thomas Hall, is a citizen of the State of (name) MD. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

\$1 Million Convincing evidence that
defendant engaged towards IED.

STATEMENT OF CLAIM

1. Plaintiff Jeremy McCullough from past to present missed the benefits and burdens of fatherhood.
2. 9/6/2019 Plaintiff was excited for the birth of his first born jeriah McCullough
3. Plaintiff ended relationship with defendant shanai woodard for her abuse and drug habits
4. As a result to plaintiff ending the relationship shanai caught on camera attacking the plaintiff leaving permeant scars.
5. Also audio for the court juniors to hear the defendant begging jeremy to get back with her.
6. Also threaten Plaintiff to keep their child away for dumping her saying she gonna be his karma
7. Shortly After between Oct 2019 to september 2020 defendant ignores text of plaintiff asking to see child.
- 8 On 9/6/2020 when plaintiff met defendant corey thomas hall at jeriah first birth day party.
9. Corey shout to plaintiff asking to speak with him outside the party, then corey and plaintiff left together.
10. Corey demanded plaintiff to pay child support and plaintiff said corey please stop your being told lies .
11. Corey ball up his hands to try and hit the plaintiff which started the first emotional trauma at plaintiff child first party 2020.
12. Defendant shanai told plaintiff that corey told her he cant come visit or see child as she was already doing before the party.
13. Between 2020 to 2021 Plaintiff file for trial to get rights and to stop the immaturity behavior's from the defendants .
14. During trial in 2021 defendant was dishonest multiple times under oath including falsely putting plaintiff on child support.
15. Lastly during trial defendant request to put plaintiff in visitation center violating his rights.
16. Fast-forward 2024 plaintiff been in the visitation center for 2 and half year now only get to see child 2 hours a month.
17. Plaintiff never had any charges or Domestic Violence on record even from the past to present from any woman record still clean.
- 18 . All this stems from a break up that the defendant refuse to accept so shanai allow the plaintiff to emotionally suffer.
19. Plaintiff miss out on all his child first christmas aswell as every holidays in the past 4 years Making plaintiff worrying and being more emotionally damage.

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Online Notepad

20. Recently plaintiff ask defendant the day before father day may he take child to movies father day of 2024 defendant said no.
21. On father day 2024 plaintiff was found passed out on job bathroom floor throwing up.
22. Job call ambulance june 16 2024 on father day to rush plaintiff to hospital being hook up in iv half conscious.
23. Doctors thru testing found that plaintiff had a serve panic attack on father day almose died being emotionally damage from the defendants.
24. Audio Recordings and photos and documents and doctor papers will prove all facts and claims to this matter.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Damages are Slander, Emotional Attack
and Emotional distress \$ 5 Million no
amount of money can replace My father Hood
Being taken away from me. Damages from 2019
Still to current time.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7/9/24, 20__.

Signature of Plaintiff

Printed Name of Plaintiff

Jeremy McCullough
Jeremy McCullough

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

Email Address

